



Received & Inspected

SEP 10 2015

FCC Mail Room

September 3rd, 2015

Mr. Raymond Hulett
72 Corporate Park
Irvine, CA 92606

Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

RE: CC Docket No. 02-6

RE: Appeal to FCC of "USAC Administrator's Decision on Appeal – Funding Year 2011-2012"
regarding E-Rate reimbursements

To Whom It May Concern:

This is an appeal of the denial issued in the USAC Administrator's Decision on Appeal – Funding Year 2011-2012 issued on July 8th, 2015 (Attachment A). This appeal was concerning the denial of reimbursement for E-Rate credits issued for the 2011-2012 funding year to Coachella Valley Unified School District (CVUSD):

- Billed Entity Number: 143707
- Form 471 Application Number: 786774
- Funding Request Numbers: 2198838, 2198848
- Service Provider Identification Number: 143020136
- Service Provider Name: U.S. TelePacific Corp DBA TelePacific Communications.

History:

- A SPI Form (Form 474) was submitted in October 2012 for CVUSD for the credits issued for the 2011-2012 funding year.
- On October 26th, 2012, I received a PIA Review notification from Eric Knowlton regarding this invoices which included the requirement for the applicant to provide proof of payment for the applicant portion.
- On November 26th, 2012, whole or partial denials (Attachment B) were issued with the reason cited as "Payment of Applicant Portion Not Validated."
- On July 26th, 2013, I mailed a second SPI Form for the portions of the previous claim that had been denied as we believe these were denied in error. I also included a cover letter stating this (Attachment C)

No. of Copies rec'd 0
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- On September 3rd, 2013, I received a second PIA Review notification from John Dasilva because of a possible duplicate invoice.
- On September 19th, 2013, I provided Mr. Dasilva with the required calculation worksheets, invoice copies, as well as payment information (Attachment D). I also noted that there was some confusion on the part of myself and the applicant. We thought that since I had initiated the secondary review as a representative of the customer, that it was I who should complete that portion of the PIA Review. However, in the email, I requested confirmation if that was right so we could correct it if it wasn't. I had also emailed Mr. Dasilva on September 13th, 2013, and explained what I believe to be the reason behind the original reimbursement denials on November 26th, 2012 (Attachment E).
- There was no communication back regarding either the completion of the payment certification step or the issue of the original denials. Instead, on November 10th, 2013, I received a second reimbursement denial for all line items on the invoice submitted with the reason cited as "Service Certification Received but Invalid".
- On October 10th, 2013, I contacted Mr. Dasilva via email requesting elaboration on the reason for denial and also asked if I needed to submit an Invoice Deadline Extension in addition to submitting an appeal to USAC.
- On October 15th, 2013, I received a response indicating that the denial was because the applicant had not completed the payment certification portion, and was provided with a toll free number to call with questions about appeals.
- On December 13, 2013, I submitted an appeal of the reimbursement denial to USAC (Attachment F) and I received the automated confirmation from USAC that the appeal was received (Attachment G).
- Having not heard anything from USAC regarding the appeal in 2013, 2014, or the first half of 2015, I contacted USAC via the Submit a Question tool on the website on June 16th, 2015 as to the status of the appeal (Attachment H).
- After confirming with USAC that the appeal was submitted to USAC and not the FCC, per the request of USAC, the appeal with all supporting documents was resubmitted to them on June 16th, 2015 (Attachment I) and on June 17th I received confirmation that it had been received and was currently under review (Attachment J).
- July 8th, 2015, the denial of the appeal was received with that stated reason that it was submitted after the 60 day window.

Reasons for Appeal to the FCC:

- Firstly, we believe that the original denial of reimbursement was invalid, as was indicated to Mr. Dasilva in an email on September 13th, 2013:
 - "The issue is this: Due to the timing of Funding Approval for the 2008-09 Funding Year and 2010-11 Funding Year FRNs, the funding for both years was applied to the accounts almost simultaneously – the 2008-09 FY FCDL wasn't issued until



12/15/10 with the Form 486 processed in time for us to apply the credits for their 1/16/11 invoice. The 2010-11 FY FCDLs were issued 1/27/11 and 11/9/10 with the Form 486 processed in time for us to apply the credit for their 3/16/11 invoice. As a result, their account had sufficient credit balances that – with the exception of one invoice for account 14302 – there was no payment due for any of the actual invoices issued for the 2011-12 Funding Year. The credit balance for account 14302 as exhausted by the 11/16/11 invoice and they did make a payment in full for that invoice, but by the time the next invoice (12/16/11) was issued, the funding for the 2011-12 FY was approved, and they received several months of credits and then continued to receive one credit a month for the rest of the funding year. This resulted in a credit balance on the account through the 9/16/12 invoice. So for each invoice where the applicant has to fill in the “Date Applicant Portion Paid and Check No. or Date will be Paid”, the answer is going to be that “no payment was made” since none was due. But this should not be deemed a failure on the part of the applicant to pay their portion – they paid for almost two whole funding years before the funding was approved and their accounts acquired the large credit balances which required no payment from us.” (Attachment E)

- This is why we believe the reimbursement to us was denied, but I never received any communication from Mr. Knowlton, Mr. Dasilva, or anyone else with USAC to either confirm or discuss this.
- Secondly, the second appeal was denied because the service/payment certification was completed by me and not the applicant. However, this was a specific point of confusion noted to Mr. Dasilva and confirmation on the course of action we took was requested. None was received.
- Thirdly, the appeal to USAC was denied because the appeal was originally submitted just five days outside of the 60 day window. However, once the appeal was submitted, and despite receiving confirmation of this, there was over 19 months of silence from USAC which seems like it would have continued indefinitely had I not reached out for a status update.

Desired Resolution:

- Given the lack of communication regarding our confusion about the service/payment portion of the PIA Review although it was requested, the lack of communication regarding what we believe to be the original issue, and the extreme length of time from the submission of the original appeal to its actual consideration, we ask that the denial of the appeal to USAC be overturned and the 60 day requirement waived.
- We believe that the original denial of reimbursement was invalid and that it be reconsidered based on the facts of the case, primarily that during the 2011-12 funding year the applicant had many months where no payment was due to TelePacific because



in the beginning of 2011 the applicant received approvals for two funding years (one extremely late) which caused a large credit balance on the account. As such, no payment was due to TelePacific for quite some time. As was pointed out, this should not be considered a failure to pay their portion since they had been paying more than their portion for quite some time due to the delay in funding approval.

- Ultimately, we believe that the entire amount reimbursement requested on the second SPI Form submitted July 26th, 2013 - \$180,119.92 – is for valid credits issued to CVUSD for the 2011-2012 funding year and should be reimbursed to TelePacific.

For any questions, additional information required, or any clarifications needed, please contact me directly by phone at (949) 777-7102 or via email at rhulett@telepacific.com

Sincerely,

A handwritten signature in black ink, appearing to read 'Raymond Hulett', with a horizontal line extending to the right.

Raymond Hulett

Senior Revenue Analyst, Finance

TelePacific Communications

72 Corporate Park

Irvine, CA 92606

P: (949) 777-7102

F: (949) 777-7103

rhulett@telepacific.com



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

July 08, 2015

Ray Hulett
TelePacific Communications
72 Corporate Park
Irvine, CA 92606

Re: Applicant Name:	COACHELLA VALLEY UNIF SCH DIST
Billed Entity Number:	143707
Form 471 Application Number:	786774
Funding Request Number(s):	2198838, 2198848
Decision Letter Date:	October 10, 2013
Date Appeal Postmarked:	December 13, 2013
Your Correspondence Received:	December 13, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Remittance Statement was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Schools and Libraries Division
Universal Service Administrative Company

cc: Cathy Benham

143020136|U.S. TelePacific
Corp|rhulett@telepacific.com|usacstatement@universalservice.org|C00057992
0|50|9884.63|10/10/2013|N
143020136|2198848|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280237;Amount Requested:12844.87;Service Cert
Received but Invalid;1228;"
143020136|2198848|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280238;Amount Requested:13193.66;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280239;Amount Requested:11969.50;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280240;Amount Requested:12942.27;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280241;Amount Requested:12965.41;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280242;Amount Requested:12561.16;Service Cert
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Item Detail Number:6280243;Amount Requested:13109.80;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280244;Amount Requested:12041.09;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280245;Amount Requested:16885.08;Service Cert
Received but Invalid;1228;"
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Item Detail Number:6280246;Amount Requested:16885.08;Service Cert
Received but Invalid;1228;"
143020136|2198838|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280247;Amount Requested:7673.64;Service Cert Received
but Invalid;1228;"
143020136|2198838|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280248;Amount Requested:4870.08;Service Cert Received
but Invalid;1228;"
143020136|2198838|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280269;Amount Requested:4870.08;Service Cert Received
but Invalid;1228;"
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Item Detail Number:6280234;Amount Requested:2659.13;Service Cert Received
but Invalid;1228;"
143020136|2198848|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280235;Amount Requested:11819.48;Service Cert
Received but Invalid;1228;"
143020136|2198848|CVUSD2011FYRESUB|0.00|"SLD Invoice Number:1866762;Line
Item Detail Number:6280236;Amount Requested:12829.59;Service Cert
Received but Invalid;1228;"



July 26, 2013

RE: Form 474 – Service Provider Form Identifier CVUSD 2011 FY RESUB

To Whom It May Concern:

This is a resubmission of a Form 474 for which some line items were fully or partially denied due to "Incomplete documented provided for review" and/or "Payment of Applicant Portion Not Validated". We believe these denials were an error and as such request that the current Form 474 be reviewed in light of this. Please note that line items for the following Customer Billed Dates (column 9) were partially approved previously:

072011 - \$9288.92 of \$11,948.05 Amount Billed to USAC approved.
012012 - \$325.84 of \$12,295.34 Amount Billed to USAC approved.
022012 - \$347.38 of \$13,289.65 Amount Billed to USAC approved.
032012 - \$344.31 of \$13,309.72 Amount Billed to USAC approved.
042012 - \$338.05 of \$12,899.21 Amount Billed to USAC approved.
052012 - \$357.58 of \$13,467.38 Amount Billed to USAC approved.
062012 - \$354.20 of \$12,395.29 Amount Billed to USAC approved.

The line items in this Form 474 are not duplicates. They are resubmissions for the portion of the previous line items that were denied.

Please include me in all communications regarding documentation or payment information needed as I may be able to assist. I can be reached at (949) 777-7102 or rhulett@telepacific.com.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Raymond Hulett', is written over a horizontal line.

Raymond Hulett
Senior Revenue Analyst
TelePacific Communications
SPIN: 143020136

FCC Form 474
Do Not Staple This Form

Do not write in this space.

Approved by OMB
OMB Control No. 3060-0856
Estimated time per response: 1.0 hour

Schools and Libraries Universal Service
Service Provider Invoice FCC Form 474
This form can be filed online or by mail.

Please read instructions before completing

Service Provider Form Identifier (Create an identifier for your own reference)

CVUSD 201FY RESUB

FCC Form 474 Invoice # _____

(To be inserted by administrator)

BLOCK 1: Service Provider Information

1. Service Provider Name

U.S. TELEPACIFIC CORP DBA TELEPACIFIC COMMUNICATIONS

2. Service Provider Identification Number (SPIN)

143020136

3. Contact Person's Name

RAYMOND HULETT

4. Contact Telephone Number Area Code: Phone Number: Ext.

(949) 777-7102

Contact Fax Number Area Code: Fax Number:

(949) 777-7103

Contact Email Address

rhulett@telepacific.com

5. Total Invoice Amount (total of Block 2, Column 13)

\$180,119.92

SPIN 143620136
Service Provider Form Identifier CVUSD 2011FY RESUB
Contact Person RAYMOND HULETT
Contact Telephone Number (949) 777-7107

Block 2, Page 1 of 2

Make as many copies of this page as necessary,

and number the completed pages to assure that they are all processed correctly.

BLOCK 2: Funding Request Number Information

	6	7	8	9	10	11	12	13
	FCC Form 471 Application Number (from Funding Commitment Decision Letter)	Funding Request Number (FRN) (from Funding Commitment Decision Letter)	Bill Frequency (e.g., Monthly, Quarterly, Annually, One-time, Other)	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service per FRN	Discount Rate	Amount Billed to USAC (Column 11 multiplied by Column 12)
				For each FRN, there should be an entry in Column 9 or Column 10 but NOT BOTH				
1	786774	2198848	Monthly	072011		13424.78	89	2659.13
2	786774	2198848	Monthly	082011		13300.32	89	11819.48
3	786774	2198848	Monthly	092011		14415.27	89	12829.59
4	786774	2198848	Monthly	102011		14432.44	89	12844.87
5	786774	2198848	Monthly	112011		14824.42	89	13,193.66
6	786774	2198848	Monthly	012012		13814.99	89	11,969.50
7	786774	2198848	Monthly	022012		14932.19	89	12,942.27
8	786774	2198848	Monthly	032012		14954.74	89	12,965.41
9	786774	2198848	Monthly	042012		14493.49	89	12,561.16
10	786774	2198848	Monthly	052012		15131.89	89	13,109.80
11	786774	2198848	Monthly	062012		13927.30	89	12,041.09
12	786774	2198838	Monthly	072011		18972.00	89	16885.08
13	786774	2198838	Monthly	082011		18972.00	89	16885.08
14	786774	2198838	Monthly	092011		8622.07	89	7673.64
15	786774	2198838	Monthly	102011		5472.00	89	4870.08
	TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM 5							

SPIN <u>143070136</u> Service Provider Form Identifier <u>CVUSD 2011 FY RESUB</u> Contact Person <u>RAYMOND HURTT</u> Contact Telephone Number <u>(949) 777-7107</u>								
							Block 2, Page <u>2</u> of <u>2</u>	
and number the completed pages to assure that they are all processed correctly.								
BLOCK 2: Funding Request Number Information								
	6	7	8	9	10	11	12	13
	FCC Form 471 Application Number (from Funding Commitment Decision Letter)	Funding Request Number (FRN) (from Funding Commitment Decision Letter)	Bill Frequency (e.g., Monthly, Quarterly, Annually, One-time, Other)	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service per FRN	Discount Rate	Amount Billed to USAC (Column 11 multiplied by Column 12)
				For each FRN, there should be an entry in Column 9 or Column 10 but NOT BOTH				
1	786774	298838	Monthly	11/2011		5472.00	89	4870.08
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM 5								

Approved by OMB
OMB Control No. 3060-0856

Service Provider Invoice FCC Form 474

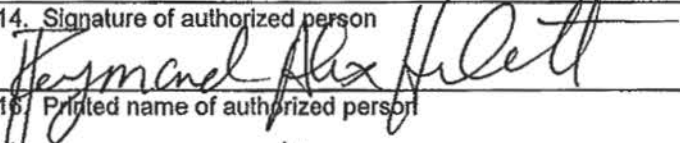
Service Provider Form Identifier CVUSD 2011FY RESUBContact Person RAYMOND HULETTContact Telephone Number (949) 777-7102

Block 3: Service Provider Certifications & Signature

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Invoice Form (FCC Form 474) and acknowledge to the best of my knowledge, information and belief, as follows:

- A. I certify that this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments.
- B. I certify that the certifications made on the Service Provider Annual Certification Form (FCC Form 473) by this Service Provider are true and correct.
- C. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

14. Signature of authorized person



15. Date

7.26.13

16. Printed name of authorized person

RAYMOND HULETT

17. Title or position of authorized person

SENIOR REVENUE ANALYST

18. Telephone number of authorized person

(949) 777-7102

19. Address of authorized person

72 CORPORATE PARK
IRVINE, CA 92606

Ray Hulett

From: Ray Hulett
Sent: Thursday, September 19, 2013 2:16 PM
To: 'Dasilva, John'
Subject: RE: Invoice 1866762
Attachments: FRN 2198838 Worksheet.xls; FRN 2198848 Worksheet.xls; CVUSD - 2011FY Invoices.zip
Importance: High

Good afternoon, John,

Attached is are the completed worksheets and a zipped folder containing the invoice copies, completed Service Certification for SLD Invoices, and some payment support.

A few notes/questions:

In discussing the Service Certification for SLD Invoices document, it seemed to the customer and myself that in this case I am representing them (and TelePacific) and as such it was probably me that should complete them. This is what has been done. I am still working to get copies of payment support from the bank, but I have included screenshots from our billing system which show the check #, account #, and banking information. If any of this is insufficient or was done incorrectly, please let me know ASAP and I and/or the customer will provide the correct documentation. Additionally, for the Certifications, many of them have "N/A" in the "Date Applicant Portion Paid and Check No. or Date will be Paid" for the reason I specified in my previous email, i.e. the account had a credit balance so no payment was due. As I have not heard back about that, I'm assuming it's because you were waiting for the attached information – if you have any questions or need clarification, please feel free to call or email me! Finally, for the "Date Goods/Services Delivered", I entered the start of the funding year – 7/1/11 – and noted the statement date as I wasn't sure which to put. For all accounts and services, initial installation and delivery preceded the start of the funding year so all services were delivered as of the start of the funding year. There were no new services delivered or installed during the funding year, though, as noted, there were some services disconnected. Please also confirm if that was acceptable or if that along with anything else needs to be corrected and we will do so.

If you have any trouble with the zipped folder, let me know and I will send you the documents individually.

Thank you!

Ray Hulett
Senior Revenue Analyst
Revenue Assurance/Finance
TelePacific Communications
72 Corporate Park,
Irvine, CA 92606
Phone: (949) 777-7102
Fax: (949) 777-7103
email: rhulett@telepacific.com

From: Dasilva, John [mailto:John.DASILVA@sl.universalservice.org]
Sent: Thursday, September 12, 2013 8:29 AM
To: Ray Hulett
Subject: RE: Invoice 1866762

Extension Granted.

Ray Hulett

From: Ray Hulett
Sent: Friday, September 13, 2013 3:53 PM
To: 'Dasilva, John'
Subject: RE: Invoice 1866762

Importance: High

Good afternoon, John,

While the application prepares their portion of the data, I need to address the issue up front that was the problem when the first SPI was submitted and a subsequent USAC request for the same data requested below was sent to us.

The issue is this: Due to the timing of Funding Approval for the 2008-09 Funding Year and 2010-11 Funding Year FRNs, the funding for both years was applied to the accounts almost simultaneously – the 2008-09 FY FCDL wasn't issued until 12/15/10 with the Form 486 processed in time for us to apply the credits for their 1/16/11 invoice. The 2010-11 FY FCDLs were issued 1/27/11 and 11/9/10 with the Form 486 processed in time for us to apply the credit for their 3/16/11 invoice. As a result, their account had sufficient credit balances that – with the exception of one invoice for account 14302 – there was no payment due for any of the actual invoices issued for the 2011-12 Funding Year. The credit balance for account 14302 as exhausted by the 11/16/11 invoice and they did make a payment in full for that invoice, but by the time the next invoice (12/16/11) was issued, the funding for the 2011-12 FY was approved, and they received several months of credits and then continued to receive one credit a month for the rest of the funding year. This resulted in a credit balance on the account through the 9/16/12 invoice.

So for each invoice where the applicant has to fill in:

<i>Date Applicant Portion Paid and Check No. or Date will be Paid</i>
--

The answer is going to be that "no payment was made" since none was due. But this should not be deemed a failure on the part of the applicant to pay their portion – they paid for almost two whole funding years before the funding was approved and their accounts acquired the large credit balances which required no payment from us.

If you need invoices from those two funding years – 2008-09 and 2010-11 – and/or payment information to verify that the customer made payments for those services, please let me know.

Thank you!

Ray Hulett
Senior Revenue Analyst
Revenue Assurance/Finance
TelePacific Communications
72 Corporate Park,
Irvine, CA 92606
Phone: (949) 777-7102
Fax: (949) 777-7103
email: rhulett@telepacific.com

From: Dasilva, John [<mailto:John.DASILVA@sl.universalservice.org>]
Sent: Tuesday, September 03, 2013 1:43 PM

Ray Hulett

From: Ray Hulett
Sent: Friday, December 13, 2013 12:21 PM
To: 'appeals@sl.universalservice.org'
Subject: Appeal of Denial of Funding
Attachments: 20136J1_10102013.docx; RE: Invoice 1866762; RE: Invoice 1866762; RE: Invoice 1866762; RE: Invoice 1866762; RE: Invoice 1866762
Importance: High

To Whom it May Concern:

This is an appeal of the Denial of Funding issued for FRNs 2198848 and 2198838 as detailed in the attached documents.

Funding was denied due to "Service Cert Received but Invalid". It was relayed that the Service Certification must in all cases be supplied by the customer (see attached email dated 10/15/13). However in the attached email dated 9/19/13, I relayed to the reviewer that the applicant and I were unsure who should supply the documentation, that it seemed like it should be me since I had submitted the SPI that prompted the review (and was therefore representing the applicant), and I requested confirmation of whether or not this was correct so that we could remedy the situation if it was not. There was no communication received regarding this question, only the denial that was eventually issued. This is the email that also includes the required worksheets and invoice support for the SPI. The email dated 9/20/13 includes support of the payments received by TelePacific.

Furthermore, in the attached email dated 9/13/13, I relayed what I believe to be the issue regarding these FRNs in an attempt to start a discussion about the situation. No communication was every received regarding the situation or requests for clarification regarding the situation of any kind. Again, only the eventual denial was issued despite my attempts to establish two-way communication regarding the issue so it could be discussed and resolved.

In summary, the problems and reasons for the appeal are as follows:

- There was no communication regarding the specific and peculiar case of these FRNs and this applicant despite my attempts to establish it
- Funding has been denied for valid discounts applied to valid services during the appropriate funding year.

As such, the precise relief sought through this appeal is the approval of disbursements for all funds requested for FRNs 2198848 and 2198838 for discounts provided on the customer invoices for the funding year that have previously been denied.

I, Raymond Hulett, am the person who can discuss the appeal with USAC in detail. My contact information is as follows:

Phone: (949) 777-7102
Email: rhulett@telepacific.com
Address: 72 Corporate Park, Irvine, CA 92606

Thank you!

Ray Hulett
Senior Revenue Analyst
Revenue Assurance/Finance
TelePacific Communications
72 Corporate Park,

Ray Hulett

From: Appeals <appeals@sl.universalservice.org>
Sent: Friday, December 13, 2013 12:22 PM
To: Ray Hulett
Subject: Appeal

Thank you for submitting your correspondence by e-mail to the Schools & Libraries Division (SLD) of the Universal Service Administrative Company.
This message serves as a receipt confirmation of your submission.

Confidentiality Notice: The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

Ray Hulett

From: sldnoreply@sl.universalservice.org
Sent: Tuesday, June 16, 2015 10:44 AM
To: Ray Hulett
Subject: SLD Inquiry #: 22-785029 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-785029.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Following is the information you submitted:

*[FirstName]=Raymond [LastName]=Hulett [JobTitle]=Senior Revenue Analyst
[EmailAddress]=rhulett@telepacific.com [WorkPhone]=9497777102 [FaxPhone]=9497777103
[PreviousCaseNumber]=0 [FormType]=Appeal [Owner]=TCSB [DateSubmitted]=6/16/2015 1:22:09 PM
[AttachmentFlag]=N[FRN]=2198838 [FormType]=SPI [ApplicationNumber]=1866762 [Question2]=Good
day! This in regards to the appeal of the denial of the SPI we submitted in October 2013 for FRNs 2198838 and
2198848. Service Provider Invoice number was "CVUSD2011FYRESUB", SLD Invoice Number was 1866762.
This was a resubmission of claims submitted after they were originally denied incorrectly in November 2012 as
USAC was not clear on the state of the customer billing and what payments were/were not required, because of
the timing regarding multiple funding years and the application of the credits for this funding to the customer's
account. As a result, reimbursement to us was denied erroneously. I submitted an appeal of the second denial
and received confirmation that the Appeal was received but to date I have not received any additional
information regarding the status of our appeal. Thank you!*

Ray Hulett

From: sldcaseattachments@sl.universalservice.org
Sent: Tuesday, June 16, 2015 1:34 PM
To: Ray Hulett
Subject: SLD Inquiry #: 22-785225 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-785225.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

You indicated in your submission that you wish to send us an attachment. To submit an attachment, please reply to this message and attach your attachment to the reply. Any additional information you wish to provide should be included in the attachment, not added to the text of this email.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Here is the information you submitted:

*[FirstName]=Raymond [LastName]=Hulett [Title]=Senior Revenue Analyst
[EmailAddress]=rhulett@telepacific.com [WorkPhone]=9497777102 [FaxPhone]=9497777103
[PreviousCaseNumber]=22-785225 [DateSubmitted]=06/16/2015 16:33:52 [Question]=Good day! Attached is
the Appeal which was submitted in 2013. It was submitted in December 2013, not October, though - the denial
that is being appealed issued in October 2013. Thank you! [AttachmentFlag]=Y*

Ray Hulett

From: sldnoreply@sl.universalservice.org
Sent: Wednesday, June 17, 2015 9:31 AM
To: Ray Hulett
Subject: RE: Initial Contact, 22-785225

Thank you for your inquiry.

The appeal was received and it's currently in review. If any additional information is needed you will be contacted.

If you have any further questions, please feel free to contact our Schools and Libraries Helpline at 1-888-203-8100. Please remember to visit our website for updates: <http://www.usac.org/sl>

Thank you,
Schools and Libraries Division
Universal Service Administrative Company

-----Original Message-----

From: rhulett@telepacific.com
Subject: Initial Contact

[FirstName]=Raymond
[LastName]=Hulett
[JobTitle]=Senior Revenue Analyst
[EmailAddress]=rhulett@telepacific.com
[WorkPhone]=9497777102
[FaxPhone]=9497777103
[PreviousCaseNumber]=0

[FormType]=Appeal
[Owner]=TCSB
[DateSubmitted]=6/16/2015 2:35:13 PM
[AttachmentFlag]=N[FRN]=2198838
[FormType]=SPI
[ApplicationNumber]=1866762

[Question2]=Good Day! Per the directions from USAC in response to the original questions submitted (SLD Case #22-785029), here is the additional information requested:

****Was the appeal filed with USAC or FCC? It was filed with USAC.**

****How was the appeal submitted? It was submitted via email.**

Here is the original text from case #22-785029:

"Good day! This in regards to the appeal of the denial of the SPI we submitted in October 2013 for FRNs 2198838 and 2198848. Service Provider Invoice number was "CVUSD2011FYRESUB", SLD Invoice Number was 1866762. This was a resubmission of claims submitted after they were originally denied incorrectly in November 2012 as USAC was not clear on the state of the customer billing and what payments were/were not required, because of the timing regarding multiple funding years and the application of the credits for this funding to the customer's account. As a result, reimbursement to us was denied erroneously. I submitted an appeal of the second denial and received confirmation